

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARC STARR, *et al.*,

Plaintiffs,

*Individually and on Behalf of All
Similarly Situated Employees*

v.

CREDIBLE BEHAVIORAL HEALTH, INC.

Defendant.

Civil Action No.: 8:20-cv-02986-PJM

PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF SETTLEMENT

Marc Starr, Kelly Lewis, Anthony Regulus, Andrew Rosen, Vu Lee and Taijia Davis ("Plaintiffs"), on behalf of themselves and the putative Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq.* ("FLSA") Collective, as well as the Maryland Wage and Hour Law, Md. Code Ann., Lab. & Empl. §§ 3-401 *et seq.* ("MWHL") and Maryland Wage Payment and Collection Law, Md. Code Ann., Lab. & Empl., §§ 3-501 *et seq.* ("MWPCCL") Rule 23 Class, respectfully request that this Honorable Court grant Plaintiffs' Unopposed Motion for Final Settlement Approval ("Motion"). In support thereof, Plaintiffs state as follows:

1. On May 19, 2021, this Honorable Court granted Plaintiffs' Unopposed Motion for Preliminary Approval of the Settlement. ECF No. 21. Plaintiffs incorporate herein all arguments made within Plaintiffs' Unopposed Motion for Preliminary Approval of the Settlement.
2. This hybrid wage and hour class settlement was a product of an arms-length negotiation between Counsel that resolved a *bona fide* dispute over overtime wages. The settlement is

fair, reasonable and adequate and provides Plaintiffs and each participating Class member with monetary relief.

3. For these reasons, the Court should approve Plaintiffs' Unopposed Motion for Final Settlement Approval. Plaintiffs respectfully request that the Court: (1) issue final certification of the FLSA collective for settlement purposes; (2) issue final certification of the Rule 23 class under the MWHL and the MWPCCL for settlement purposes; (3) issue final approval of the Settlement Agreement; (4) and issue final approval of Plaintiffs' requests for attorneys' fees, costs and service awards.
4. Attached to this Motion as Exhibit 1 is the Declaration of Class Counsel Benjamin L. Davis, III regarding notice to the class.
5. Attached to this Motion as Exhibit 2 is the Proposed Order for Final Settlement Approval.

DATED: August 5, 2021

Respectfully submitted,

/s/ Benjamin L. Davis, III

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Attorneys for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of August 2021, a copy of Plaintiffs' Unopposed Motion for Final Settlement Approval of Settlement, Declaration and Proposed Order in support of Final Approval of the Settlement were served via the electronic filing system on:

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/s/Benjamin L. Davis, III
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